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Nashville, Tennessee 37201-3300

REC'D TN  
REGULATORY  
Guy M. Hicks  
General Counsel

199 OCT 25 PM 3 49

October 25, 1999

EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth  
Telecommunications, Inc. pursuant to the Telecommunications Act of 1996*  
Docket No. 99-00430

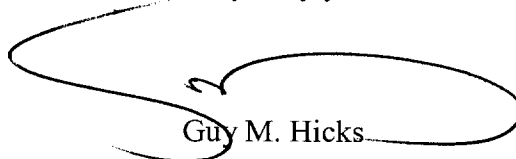
Dear Mr. Waddell:

Enclosed are the original and thirteen copies of rebuttal testimony on behalf of BellSouth  
Telecommunications, Inc.:

David A. Coon  
Keith Milner  
Alphonso J. Varner  
William Taylor  
Ronald M. Pate  
Daonne Caldwell

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

FILE

CERTIFICATE OF SERVICE

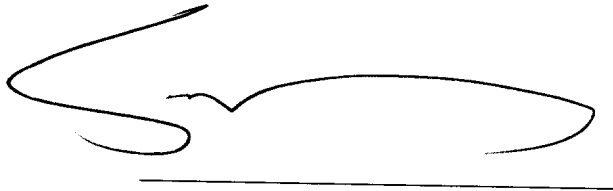
I hereby certify that on October 25, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

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- ☐ Overnight

Gary Hotvedt, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823



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**FILE**

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REBUTTAL TESTIMONY OF DAVID A. COON  
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY  
4 DOCKET NO. 99-00430

5 OCTOBER 25, 1999

6  
7  
8 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH  
9 TELECOMMUNICATIONS, INC. ("BELL SOUTH") AND YOUR BUSINESS  
10 ADDRESS.

11  
12 A. My name is David A. Coon. I am employed by BellSouth as Director of  
13 Performance Measurements for the nine-state BellSouth region. My business  
14 address is 675 West Peachtree Street, Atlanta, Georgia 30375.

15  
16 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

17  
18 A. Yes. I filed direct testimony on October 15, 1999 in this docket.

19  
20 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

21  
22 A. My testimony addresses the direct testimony filed with the Tennessee Regulatory  
23 Authority ("Authority") on October 15, 1999 by ITC^DeltaCom ("DeltaCom")  
24 witnesses Christopher Rozycki and Michael Thomas. My rebuttal testimony will

1 focus on DeltaCom Issues 1(a) and 2(b).

2  
3 ***Issue 1(a): Should BellSouth be required to comply with the performance measures***  
4 ***and guarantees for pre-ordering/ordering, resale, and unbundled network***  
5 ***elements (“UNEs”), provisioning, maintenance, interim number portability and***  
6 ***local number portability, collocation, coordinated conversion and the bona fide***  
7 ***request processes as set forth fully in Attachment 10 of Exhibit A of this***  
8 ***Petition?***

9  
10 Q. SHOULD THE PERFORMANCE MEASURES LISTED ON ATTACHMENT  
11 10 BE IMPLEMENTED AS SUGGESTED BY MR ROZYCKI ON PAGE 8 OF  
12 HIS DIRECT TESTIMONY?

13  
14 A. No. As I described in more detail in my direct testimony, BellSouth already has  
15 sufficient measures in place to allow the Authority to evaluate whether BellSouth  
16 is providing nondiscriminatory access for all CLECs in Tennessee and to do so in  
17 a manner consistent for all CLECs. A separate set of measurements just for  
18 DeltaCom would not allow this consistent evaluation. Furthermore BellSouth’s  
19 existing measurements provide nearly all of what DeltaCom requests.

20  
21 ***ISSUE 2(b): Pursuant to the definition of parity, should BellSouth be required to***  
22 ***provide Operational Support Systems?***

1 Q. ON PAGE 3 OF HIS TESTIMONY MR. THOMAS INTRODUCES EXHIBIT  
2 MT-1, MARKED "CONFIDENTIAL AND PROPRIETARY", WHICH HE  
3 ALLEGES "SHOWS THE RESALE ORDERING AND PROVISIONING  
4 INTERVALS THAT DELTACOM HAS EXPERIENCED FOR SEVERAL  
5 STATES DURING THE FIRST SIX MONTHS OF 1999...CLEARLY SHOWS  
6 THAT DELTACOM HAS NOT RECEIVED ORDERING AND  
7 PROVISIONING SERVICES THAT ARE EQUAL TO BELLSOUTH." HOW  
8 DO YOU RESPOND?

9  
10 A. In Exhibit MT-1, Mr. Thomas submitted DeltaCom data for seven of BellSouth's  
11 nine states. Noticeable by its absence, data for Tennessee was not one of the  
12 seven states cited by Mr. Thomas. DeltaCom has had very little activity in  
13 Tennessee, which may explain why Mr. Thomas chose not to include data for  
14 Tennessee in Exhibit MT-1.

15  
16 In Mr. Thomas' Exhibit MT-1 there is no information supporting this data or  
17 explanation of how the data was calculated. For example, Mr. Thomas' exhibit  
18 refers to percentage of LSRs completed within specific timeframes and not  
19 completed within specific timeframes. Does this mean the interval is for  
20 processing only the LSR or does it include the provisioning of the order also? Mr.  
21 Thomas' exhibit also lists the percentage of FOCs where due date was met.  
22 Shouldn't this be percentage of orders where due date was met? FOCs refer to  
23 when LSRs become confirmed orders and initiate the provisioning process.

1 Unlike the data presented by Mr. Thomas, the calculations of BellSouth's Service  
2 Quality Measurements are well documented as illustrated in Exhibit DAC-1 to my  
3 direct testimony. Without knowing the details of Mr. Thomas' calculations, it is  
4 impossible for BellSouth to do an "apples to apples" comparison to the data  
5 BellSouth maintains in its performance measurements database.

6  
7 Notwithstanding any suggestion by Mr. Thomas to the contrary, BellSouth is  
8 providing resale ordering and provisioning in a nondiscriminatory manner for all  
9 CLECs in Tennessee, as the following data demonstrates.

10  
11 Table 1

August 1999 % Missed Installation Appointments				
	CLEC Aggregate (resale)		BST (retail)	
	Dispatch	No Dispatch	Dispatch	No Dispatch
Residence	8.06	0.18	15.15	0.12
Business	12.70	1.15	5.93	0.07

12  
13 Table 1 shows that BellSouth-caused Missed Installation Appointments in August  
14 in Tennessee was 8.06% for all CLEC residence (resale) – dispatch. Viewed  
15 another way, Bellsouth met nearly 92% of its installation commitments for  
16 CLECs that involved a dispatch. Comparing Residence Dispatch for the CLECs  
17 to BST Retail, % Missed Installation Appointments favored the CLEC by 7.1%  
18 (15.15% less 8.06%) while % Missed Installation Appointments for Business –  
19 Dispatch favored BST by 6.8%. In the case of installation appointments that did  
20 not involve a dispatch, BellSouth made the appointment more than 98% of the  
21 time for both CLECs and BellSouth retail customers.

Table 2

August 1999				
Order Completion Interval (average interval – days)				
	CLEC Aggregate (resale)		BST (retail)	
	Dispatch	No Dispatch	Dispatch	No Dispatch
Residence	5.41	1.33	8.58	0.93
Business	6.05	1.27	7.98	1.08

Table 2 shows that the Average Order Completion Interval for both Residence - Dispatch and Business – Dispatch was approximately 2 days shorter for CLECs than BellSouth retail, while the interval for non dispatch for CLECs was slightly longer than BellSouth retail -- less than 0.5 days in each category.

Table 3

August 1999		
Firm Order Confirmation Timeliness (average interval – days)		
	CLEC Aggregate (resale)	
	Total Mechanized	Non Mechanized
Residence	0.14 (3.36 hrs.)	0.91 (21.8 hrs.)
Business	0.56 (13.44 hrs.)	0.96 (23 hrs.)

Table 3 shows that for both mechanized and non-mechanized LSRs BellSouth returned a Firm Order Confirmation in all categories on average in less than 24 hours. BellSouth's published FOC commitment interval in the BellSouth Ordering Guide is 48 hours.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes

AFFIDAVIT

STATE OF: Georgia  
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared David A. Coon-Director, Interconnection Services-Performance Measurements, BellSouth Telecommunications, Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 99-00430 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 5 pages and 0 exhibit(s).



David A. Coon

Sworn to and subscribed  
before me this 22<sup>nd</sup>  
day of October, 1999

  
NOTARY PUBLIC

MICHEALE F. HOLCOMB  
Notary Public, Douglas County, Georgia  
My Commission Expires November 3, 2001